

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

(1) JANICE BUSH, as Special)
Administrator for the Estate of)
Ronald Garland, deceased,)
)
Plaintiff,)
)
v.)
)
(2) BRET BOWLING, in his official)
and individual capacity as Sheriff Creek)
County, Okla., et al.,)
)
Defendants.)

Case No. 19-cv-00098-JFH-CDL

DEFENDANTS' MOTION AND BRIEF TO FILE EXHIBITS UNDER SEAL

This is an alleged excessive force and denial of medical care case filed under 42 U.S.C. § 1983 against numerous Defendants by Plaintiff regarding Ronald Garland's incarceration in the Creek County Detention Center on June 10, 2017. Currently, the parties' Motions for Summary Judgment are due March 29, 2021 (Dkt. 346). Defendants Sheriff Bryant, Undersheriff Thompson, and Board of County Commissioners (hereinafter referred to collectively as the Creek County Defendants) are completing their Motions for Summary Judgment and anticipate filing them soon.

Some of the exhibits to be attached to the Creek County Defendants' Motions for Summary Judgment have been designated as confidential thus, pursuant to the Court's Protective Order entered at Dkt. 49, must be filed under seal. As such, the Creek County Defendants request permission to file documents which are defined as confidential in the Court's Protective Order (Dkt. 49) and which are attached to their Motions for Summary Judgment and any subsequent Replies to be filed thereafter, under seal.

This Motion is submitted on behalf of all Defendants. A proposed Order is being

submitted with this Motion.

The undersigned has requested Plaintiff's position on this matter. Plaintiff's counsel Spencer Bryan declined to advise the undersigned of his position on this Motion and instead stated that he would let the Court know his position.

Respectfully submitted,

s/ Ambre C. Gooch
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BOARD OF COUNTY
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OF CREEK, BRET BOWLING, AND JOE
THOMPSON

CERTIFICATE OF SERVICE

I hereby certify that on February 15, 2021, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

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